

Remedium


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Robert J. Medler
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Attn.: Ms. Bonita Lavelle

Subject: OU3 RI/FS of the Libby Asbestos Site
Monthly Progress Report – February 2009

Dear Bonnie:

This progress report describes work completed during the month of February 2009, in accordance with Section IX of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation/Feasibility Study dated September 2007. A discussion of the actions taken, sampling results, planned activities, modifications, problems encountered, potential issues, anticipated delays, and solutions developed is provided below. Information by contractor is reported separately.

MWH

The following is a summary of the actions taken and progress made during the month of February.

A. ACTIONS TAKEN

- Finalized the Field Sampling Summary Report (FSSR) for Phase II sampling conducted during the 2008 field season. Submitted the Phase II FSSR to EPA on February 16, 2009.
- Reviewed and prepared comments on the draft Phase III Sampling and Analysis Plan in preparation for meetings in Denver with EPA Region 8 staff on February 4 and 5, 2009. Submitted comments to EPA on February 27, 2009.

B. SAMPLING RESULTS

LA analytical results and re-issued, lab-corrected LA analytical reports, QA/QC reports, and photomicrographs for Phase I samples have continued to be issued by the analytical laboratories. Results of LA analyses for Phase II surface water and sediment samples continued to be issued by the analytical laboratories throughout February 2009.

C. PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months.

- Begin preparation of initial sections (i.e., Introduction, Study Area Investigations, Physical Characteristics of the Study Area and Nature and Extent of Contamination) of the OU3 Remedial Investigation Report.

- Make preparations for a field tour of the OU3 study area with EPA and its contractors, as discussed during meetings on February 5 at EPA Region 8 headquarters in Denver. The tour will focus on areas outside the mine site, in portions of OU3 proposed for activity-based sampling (ABS) as part of Phase III investigations. The tour will be conducted as soon as snowmelt permits (estimated to be in late May or early June 2009).
- Continue researching air sampling pumps and other equipment required for ABS sampling.
- Analyze existing site information and make preparations for a field investigation (as soon as snowmelt permits) to characterize the nature of step-like topography on the "over-steepened" slope above and east of the Tailings Dam left abutment.
- Participate in teleconferences and other meetings as requested by EPA.

D. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL
ISSUES/ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED

- None.

Parametrix

The following is a summary of the actions taken and progress made during the month of February for Phase II C activities.

A. ACTIONS TAKEN

- Reviewed comments offered by Agencies on draft Rainbow Trout bioassay report.
- Attended meeting in Denver with Remedium, Parametrix, EPA, USFWS and State of Montana to discuss 2009 field sampling program outlined in the EPA Phase III SAP.
- Prepared a presentation of fish and invertebrate population methods and findings for review with EPA on BTAG conference call.
- Held a BTAG conference call to discuss proposed amphibian program and to review a presentation on the findings from fish and invertebrate population studies in autumn 2008.
- Submitted draft reports for Phase 1 sediment bioassays methods and findings (Hyalella, Chironomid) to Remedium for review.
- Submitted written comments on Phase III SAP to EPA.
- Submitted draft report on fish and invertebrate population work at Libby to Remedium for review.
- Submitted revised draft report on fish and invertebrate population work at Libby to Remedium to pass on to EPA for review.

- Continued revisions to the draft Rainbow Trout bioassay report based on comments received.

B. PLANNED ACTIVITIES FOR NEXT TWO MONTHS

The following tasks are scheduled to be performed over the next two months:

- Submit Final Rainbow Trout bioassay report to EPA.
- Submit Phase 1 draft sediment bioassay reports (*Hyaella*, *Chironomid*) to EPA.
- Continue BTAG discussions on methods for repeating the rainbow trout surface water bioassay.
- Receive comments from agencies on draft fish and invertebrate population study report.
- Receive comments from agencies on draft Phase 1 sediment bioassay reports.
- Work through BTAG to finalize field sampling activities for 2009.
- Cost field sampling activities at the Libby Site for Spring/Summer 2009 and begin procurement of field sampling equipment.

C. MODIFICATIONS/PROBLEMS ENCOUNTERED/POTENTIAL ISSUES/ANTICIPATED DELAYS/SOLUTIONS DEVELOPED/IMPLEMENTED

- None at this time.

If you have any questions regarding this progress report, please call Bob Marriam at (901) 820-2023.

Sincerely,



Robert J. Medler
Project Coordinator
Remedium Group, Inc.

cc: Michael DeDen - MWH
Lynne Gardner
John Garr
Catherine LeCours – Montana DEQ
Robert Marriam
Sue Robinson - Parametrix